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AML@lagomarsinolaw.comTaylor@lagomarsinolaw.com*Attorneys for Plaintiffs Rosa Lainez Lemus and G.R.L.***UNITED STATES DISTRICT COURT****DISTRICT OF NEVADA**

ROSA LAINEZ LEMUS, individually and as
natural parent and guardian of minor G.R.L.;
G.R.L., a minor,

Plaintiffs,

v.

CLARK COUNTY SCHOOL DISTRICT, a
political subdivision of the State of Nevada;
JESUS F. JARA, in his individual and official
capacity; RONNIE GUERZON, in his
individual and official capacity; RAYMOND
ORTIZ, in his individual and official capacity
BROOKE RAWLINS, in her individual and
official capacity; DOES I through 10, and ROE
CORPORATIONS 1 through 10, inclusive.

Defendants.

CASE NO.: 2:24-cv-00700-JAD-MDC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(First Request)

1 IT IS HEREBY STIPULATED AND AGREED between the parties, in accordance with
2 LR 26-3, that the discovery deadlines in this matter be continued for a period of sixty (60) days
3 from the Court's prior Order (ECF No. 15). This Stipulation is supported by good cause, is the
4 Parties' first request, and is not for the purpose of delay.

5 **I. DISCOVERY COMPLETED TO DATE**

6 The parties have completed the following discovery to date:

- 7
- 8 • Exchanged their initial Rule 26 Disclosures.
 - 9 • Plaintiffs served an initial set of discovery (interrogatories and requests for production
10 of documents) to Defendant CCSD on May 9, 2024, and CCSD served its responses
11 thereto on July 1, 2024.

12 **II. DISCOVERY YET TO BE COMPLETED**

13 The Parties have yet to complete the following discovery:

- 14 • depositions of the named parties, including 30(b)(6) depositions;
- 15 • depositions of witnesses identified by the parties;
- 16 • expert witness disclosures;
- 17 • rebuttal expert witness disclosures;
- 18 • expert witness depositions;
- 19 • additional written discovery which may include written discovery between the parties;
20 and
- 21 • subpoenas to third parties.

22 The Parties reserve the right to conduct additional discovery that is permitted by the Federal
23 Rules of Civil Procedure.

24 **III. REASONS WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

25 While the parties have been diligent in conducting discovery in this matter, the following
26 issues have been unavoidable. Defendants filed their Motion to Dismiss Plaintiffs' Amended
27 Complaint, and the Motion is still pending before this Court. (ECF No. 8). The Motion to
Dismiss was fully briefed as of May 30, 2024. The Parties have also worked together to dismiss

individual defendants JARA, GUERZON, ORTIZ, and RAWLINS, making CCSD the only remaining Defendant.

Plaintiffs' counsel's office is currently short-handed as one associate is on paternity leave and the remaining three (3) attorneys in the office, including Plaintiffs' main attorney, are preparing for a two-week trial in the Eighth Judicial District Court. Plaintiffs' counsel's office's limited availability warrants an extension. Furthermore, the parties have been cooperating in this action and this extension is necessary and not for purposes of delay.

IV. PROPOSED EXTENDED DEADLINES

The parties respectfully request this Court enter an order granting this extension of discovery deadlines, as follows:

	<u>Current</u>	<u>Proposed</u>
Deadline for initial expert disclosures	08/09/24	Tuesday, October 8, 2024
Deadline for rebuttal expert disclosures	09/09/24	Friday, November 8, 2024
Close of Discovery	10/08/24	Monday, December 9, 2024
Deadline to file dispositive motions	11/07/24	Monday, January 6, 2025
Pre-Trial Order	12/09/24	Friday, February 7, 2025

IT IS SO STIPULATED AND AGREED.

DATED this 9th day of July, 2024.

LAGOMARSINO LAW

/s/ Taylor N. Jorgensen
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 Attorneys for Plaintiffs Rosa Lainez Lemus
 and G.R.L.

DATED this 9th day of July, 2024.

**CLARK COUNTY SCHOOL DISTRICT
 OFFICE OF THE GENERAL COUNSEL**

/s/ Melissa Alessi
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 Attorney for Defendants Clark County
 School District, Jesus F. Jara,
 Ronnie Guerzon, Raymond Ortiz,
 and Brooke Rawlins

1 DATED this 9th day of July, 2024.

2 **BERTOLDO CARTER SMITH & CULLEN**

3 /s/ James R. Sweetin
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10 *and G.R.L*

11 DATED this 9th day of July, 2024.

12 **ROBERT L. LANGFORD & ASSOCIATES**

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18 *Attorneys for Plaintiffs Rosa Lainez Lemus*
19 *and G.R.L*

20 **IT IS SO ORDERED.**

21 
22 _____
23 Hon. Maximiliano D. Couvillier III
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: 7/10/24